



Rainbow
Adoptions
International, Inc.

860.721.0099

80 Garden Street

Wethersfield, CT 06109

NOV 26 2003

November 10, 2003

U. S. Department of State CA/OCS/PRI
Adoption Regulations Docket Room
2201 C Street NW
Washington, DC 20529

To Whom It May Concern:

RE: State/AR-01/96

The Department of State is in the process of proposing regulations to implement the 1993 Hague Convention on Protection of Children and Co-operation in Respect of Intercountry Adoption and the Intercountry Adoption Act of 2000. As the Executive Director of a small adoption agency, Rainbow Adoptions International, Inc., I am writing to offer my input into this process.

Overall, I am supportive of the efforts that are being made to bring uniformity and high standards to a previously unregulated field. However, my primary concern is that the new regulations will essentially drive small adoption agencies out of business. The cost of becoming accredited by a Hague-approved organization presents as very expensive both in staff time and financial resources. In Connecticut, adoption agencies already undergo intensive scrutiny every two years by our state licensing department, and I believe that a separate system of accreditation would be cumbersome and unnecessary. In addition, the proposed regulations require insurance coverage that would be cost prohibitive to a small agency such as mine. I already carry two insurance policies, and I make it a priority to cover myself and my board of directors as much as possible. The new Hague regulations appear to provide much less protection for the adoption agencies, and I already feel exposed to litigation quite enough as it is. Along this same line, I am also concerned that I will be required to take financial responsibility for the actions of my overseas contacts even though they are not my employees. It is impossible for me to guarantee the actions of the liaisons, attorneys, doctors, nannies, orphanage directors, and other personnel who are connected to the adoption process in a foreign country. Once again, only the largest adoption agencies could provide such assurance and assume this kind of risk.

I am asking that you consider the implications to small businesses when you finalize the regulations to the Hague Convention. Small adoption agencies offer high-quality, personalized, meaningful services to many parents who truly need an individualized approach to building their

families. I believe that it would be a monumental disservice to the adoption community and children in need of families to approve the proposed Hague regulations without further consideration of the points that I have put forth. Thank you for your time.

Sincerely,

A handwritten signature in black ink, appearing to read "Lori L. Snow", written in a cursive style.

Lori L. Snow, Psy.D.
Executive Director
Licensed Psychologist